

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STONEX GROUP INC. and STONEX	:	Case No. 23-CV-613 (JGK)(VF)
FINANCIAL INC.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
	:	
HOWARD SHIPMAN,	:	
	:	
Defendant.	:	
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**DECLARATION OF LLOYD B. CHINN IN SUPPORT OF PLAINTIFFS' MOTION
FOR SANCTIONS AGAINST DEFENDANT HOWARD SHIPMAN**

LLOYD B. CHINN, hereby declares under penalty of perjury as follows:

1. I am a member of the law firm of Proskauer Rose LLP, attorneys for Plaintiffs StoneX Group, Inc. and StoneX Financial, Inc. ("StoneX") in the above-referenced matter. I am fully familiar with the facts and circumstances recited herein from personal knowledge and from my review of documents in this matter.

2. I submit this Declaration in support of StoneX's Motion seeking sanctions against Defendant Howard Shipman.

3. Attached hereto as **Exhibit 1** is a true and correct copy of portions of Defendant's June 14, 2023 sworn deposition testimony.

I declare under penalty of perjury that the foregoing is true and correct.

New York, New York
Dated: October 26, 2023

/s/ Lloyd B. Chinn
Lloyd B. Chinn